



The Voice of York's Bus Users

<http://www.yorkbusforum.org/>

@bus_york

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York Local Plan - Phase 2 Statement for Matters 4 and 6

Dear Carole

Thank you for your emails of February 17th, confirming my request to participate in person and for your email of 3rd March, advising postponement of the hearing dates.

In view of the change made to Matter 1, we no longer wish to attend for that session, but still wish to attend for Matters 4 and 6. We are assuming, based on the provisional new start date of 26th April, that these will now be held (allowing for the early May Bank Holiday) on 3rd and 5th May and will keep these dates free until the new hearings timetable is confirmed.

I am now writing to set out the terms of our concerns regarding Matters 4 and 6. .

Introduction

York Bus Forum is an independent voluntary organisation, open to all. It was formed in 2016 to provide a voice for bus passengers – residents, commuters and visitors – and to press for improved public transport. In addition to individual members, several Parish Councils and transport user groups are affiliated to the Forum and we are currently undertaking a membership campaign to encourage more to join us. This includes working with local bus operators to publicise the Forum and to promote bus services generally.

We are now an established, stakeholder on transport issues in the city who is widely listened to. We have a good working relationship with Councillor D'Agorne (Executive Member for Transport and Deputy Leader) and the Council's Sustainable Transport Team, as well as the major bus operators, York Civic Trust and York Environment Forum. We have regular meetings with the main political groups of councillors and have active members from the Labour, Liberal Democrat and Green Parties.

We have worked with the Council's Sustainable Transport Team to produce the Bus Service Improvement Plan required under the government's National Bus Strategy and expect to provide a key user input to the forthcoming Enhanced Partnership.

We strongly support the need for a Local Plan and have no wish to delay the process of producing the Plan.

National Planning Policy Framework (NPPF) March 2012

We understand this is the main policy under which the Local Plan is being considered - with possible adjustments to take account of the pandemic and Brexit. Section 4 describes the requirements for promoting sustainable transport.

NPPF paragraph 30 says that in preparing Local Plans “local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

Moreover, NPPF paragraph 35 says that “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.” It stresses that developments should be located and designed where practical to address a number of issues, including “give priority to pedestrian and cycle movements, and have access to high quality public transport facilities”.

The policy also requires (paragraph 36) a Travel Plan for all developments which generate significant amounts of movement.

Revised Schedule of Matters, Issues and Questions for the Examination (MIQ)

[EX/INS/30]

Whilst some of the issues we raised on the MIQs have been addressed, it seems to us that Matters 4 and 6 are not in compliance with the requirements set out above.

Matter 4

We note that details of the high quality public transport facilities (e.g. ultra light rail or on-demand minibuses) required under NPPF 2012 paragraph 35 are not requested by the inspectors and there appears to be no reference to the requirement (paragraph 36) for a Travel Plan for any of the developments – many of which will clearly generate significant amounts of movement as currently proposed.

Question 4.2: Is the approach taken in informing the Spatial Strategy and the distribution of development across the Plan area justified, effective and in accordance with national policy?

The proposed distribution of development does not appear to take into consideration the requirement to facilitate the use of more sustainable transport – in particular the viable provision of bus services.

Question 4.4: Policy SS1 sets out a spatial principle for sustainable modes of transport and Paragraph 3.12 of the submitted Plan says support will be provided for a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth of traffic.

- a) How does the Plan deliver this?
- b) What evidence is there that the Spatial Strategy delivers what Paragraph 3.12 of the submitted Plan says?
- c) Is it the most appropriate strategy when assessed against alternatives?

Policy SS1 includes two principles related to transport:

- *‘ensuring accessibility to sustainable modes of transport and a range of services*
- *preventing unacceptable levels of congestion, pollution and/or air quality.’*

Para 3.12 states that it is “important that future development does not lead to an unconstrained increase in traffic ... [which] could lead to increased congestion ...” and that *‘the Local Plan will*

support a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth in traffic’.

We fully support these principles, but are not satisfied that they have been effectively applied in the draft Local Plan.

The Transport Topic Paper only appears to assess one pattern of distribution of new development. It predicts a 55% increase in congestion, which clearly fails the draft Plan’s second principle above. Such a major increase in congestion is likely to massively worsen the disruption to and unreliability of local bus services, to the detriment of users, use and operator costs, which may then lead to reduced numbers of slower services and a potential spiral of decline, rather than the improvement the NPPF supports.

The Government guidance on the transport assessment of Local Plans (DfT, 2015 in relation to NPPF 2012) that any such assessment should:

- *assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms*
- *assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport*
- *highlight and promote opportunities to reduce the need for travel where appropriate*
- *identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.*

In our view, therefore, the Plan does not appear to deliver the principles cited above. In particular, no alternatives to address the predicted increase in congestion (eg the viable provision of bus services) have been identified or assessed.

The Council should be asked to carry out the analysis and assessment of alternatives, as specified by Government, so that it can be considered in the transport hearing (phase 4) of the Inquiry.

Matter 6

Like Matter 4, this also contains no reference to high quality public transport facilities or any request for mitigation measures to reduce the impact of the additional traffic which the new developments will generate. The allocations in the schedule of measures looks correspondingly inadequate, and certainly far short of the £46.5m the Council identified for the Bus measures necessary to deliver the Government’s Bus Back Better agenda (reference the Council’s recent Bus Service Improvement Plan submission to the Government). We also note the press reports indicating the Government’s allocation for funding Bus Improvements was multiple times over-subscribed, so delivering it may fall substantially to local authorities and planning gain to deliver it.

There is also no information on how sensitive the Local Plan will be to changes in legislative and other requirements which are not known at the time of its submission but occur within the plan period e.g. reductions in emissions targets impact of the pandemic on bus provision.

We are very concerned that the resources needed to provide viable, high-quality bus services to the currently proposed distribution and pattern of new development are unlikely to be available **and would ask the Inspector to press the Council to address this.**

Many thanks.

Kind regards.

Graham Collett Vice-Chair